

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

JAMIE MONIQUE DEAN

CRIMINAL NO.:

DATE FILED:

VIOLATIONS:

**18 U.S.C. § 1344 (scheme to defraud a
financial institution - 1 count)**

**18 U.S.C. § 1005 (false entry in bank
records - 4 counts)**

18 U.S.C. § 656 (embezzlement - 4 counts)

Notice of additional factors

Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. Mellon Bank N.A. ("Mellon Bank") was a financial institution chartered under the laws of the United States, the deposits of which were insured by the Federal Deposit Insurance Corporation, under Federal Deposit Insurance Corporation ("FDIC") certificate number 7946.

2. From on or about April 29, 1998 through on or about May 14, 1998, at Philadelphia, Pennsylvania, within the Eastern District of Pennsylvania, defendant

JAMIE MONIQUE DEAN

and others, known and unknown to the grand jury, knowingly executed and attempted to execute a scheme to defraud Mellon Bank and others, and to obtain monies owned by and under the care, custody, and control of the Bank by means of materially false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. JAMIE MONIQUE DEAN was an employee of Mellon Bank.

4. JAMIE MONIQUE DEAN, and others known and unknown to the grand jury, secured unauthorized and stolen access devices, that is, credit card numbers.

5. JAMIE MONIQUE DEAN, and other persons known and unknown to the grand jury, made false and fraudulent cash disbursement drafts on the books of Mellon Bank against these stolen and unauthorized credit card numbers. This meant that DEAN and the others stole cash from Mellon Bank because the cash withdrawals were fraudulently charged to stolen credit cards.

6. The false and fraudulent cash disbursement drafts allowed JAMIE MONIQUE DEAN and others to steal money of, and under the control of, Mellon Bank while concealing the fact that they were stealing this money.

7. As a result of the actions of JAMIE MONIQUE DEAN, and others known and unknown to the grand jury, Mellon Bank and other victims suffered losses of approximately \$85,000.

All in violation of Title 18, United States Code, Section 1344.

COUNTS TWO THROUGH FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of paragraphs 1 and 3 through 7 of Count One of this Indictment are realleged.

2. On or about the following dates, at Philadelphia, Pennsylvania, within the Eastern District of Pennsylvania, defendant

JAMIE MONIQUE DEAN

knowingly made false entries in a book, report and statement of Mellon Bank, that is, cash disbursement drafts, in the amounts set forth below, against a stolen and unauthorized credit card number, with intent to injure and defraud an individual person and to deceive any officers of Mellon Bank:

COUNT	DATE	AMOUNT
TWO	April 29, 1998	\$8,000
THREE	May 4, 1998	\$6,000
FOUR	May 6, 1998	\$3,000
FIVE	May 6, 1998	\$5,000

All in violation of Title 18, United States Code, Section 1005.

COUNTS SIX THROUGH NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of paragraphs 1 and 3 through 7 of Count One of this Indictment are realleged.

2. On or about the following dates, at Philadelphia, Pennsylvania, within the Eastern District of Pennsylvania, defendant

JAMIE MONIQUE DEAN

being an employee, that is a bank teller, of Mellon Bank, a financial institution in Philadelphia, Pennsylvania, the deposits of which were insured by the FDIC, certificate number 7946, on the dates set forth below knowingly embezzled, abstracted, purloined and willfully misapplied approximately \$22,000 of funds and monies intrusted to the custody and care of Mellon Bank:

COUNT	DATE	AMOUNT
SIX	April 29, 1998	\$8,000
SEVEN	May 4, 1998	\$6,000
EIGHT	May 6, 1998	\$3,000
NINE	May 6, 1998	\$5,000

All in violation of Title 18, United States Code, Section 656.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One through Nine of this indictment, defendant JAMIE MONIQUE DEAN committed offenses in which the loss exceeded \$ 70,000, that is, approximately \$85,000, as described in U.S.S.G. § 2B1.1(b)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1344, 1005 and 656, as set forth in Counts One through Nine of this Indictment, the defendant,

JAMIE MONIQUE DEAN

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property, real and personal, constituting and derived from proceeds obtained directly or indirectly as a result of such violation.

2. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty, it is the intent of the United States, pursuant to Title 18, United States Code,

Section 982(b)(1), incorporating Title 21, United States Code § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney